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14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

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18 IN RE: UBER TECHNOLOGIES, INC.,  
19 PASSENGER SEXUAL ASSAULT  
LITIGATION

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21 This Document Relates to:

22 ALL ACTIONS  
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Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA HAYES  
GROMADA IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, RASIER-CA, LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF MOTION  
TO ENFORCE PROTECTIVE ORDER  
AND SUPPORTING MATERIALS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

DECLARATION OF VERONICA HAYES GROMADA IN SUPPORT OF DEFENDANTS' MOTION TO SEAL RE:  
MOTION TO ENFORCE PROTECTIVE ORDER

Case No. 3:23-MD-3084-CRB

1 I, Veronica Hayes Gromada, declare:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon, L.L.P. I am a member in good  
3 standing of the Bars of the State of Texas and the District of Columbia, and am admitted to practice  
4 pro hac vice before this Court. I know the following facts to be true of my own knowledge, except  
5 those matters stated to be based on information and belief. If called upon to testify, I could and would  
6 testify competently to the truth of the matters stated herein. I respectfully submit this declaration in  
7 support of Defendants' Motion To Seal Portions of Supporting Materials for Motion to Enforce  
8 Protective Order ("Motion to Seal" and "Motion to Enforce," respectively).

9 2. This Motion to Seal concerns a declaration I submitted in support of the Motion to  
10 Enforce (the "Declaration"). That Declaration provides further information regarding the materials  
11 Defendants seek to redact in the Motion to Seal and is incorporated herein. I have reviewed my  
12 Declaration and all exhibits to that Declaration ("Exhibits"), including Exhibits 1, 3, 6, 7, 16, and 17  
13 (the "lists"). Exhibits 1, 3, 6, 7, 16, and 17 are described in detail in the Declaration. Exhibit 1 is  
14 described in paragraphs 2-3. Exhibit 3 is described in paragraphs 10-17. Exhibit 6 is described in  
15 paragraphs 18-25. Exhibit 7 is described in paragraphs 26-29. Exhibit 16 is described in paragraphs  
16 39-41. Exhibit 17 is described in paragraph 42.

17 3. The disclosure of Defendants' confidential information in the supporting Declaration  
18 to Defendants' Motion to Enforce, and the Exhibits to that Declaration, was necessary to establish the  
19 protective order violation addressed in the Motion to Enforce.

20 4. Disclosure of the lists of hundreds of policy-related resources and their internal source  
21 and categorization poses a risk of competitive harm and security risks to Defendants. The  
22 comprehensive nature of the lists at issue—which are repurposed variations of the same list—renders  
23 this information different in kind than a basic, discrete list of policies: they disclose a roadmap to  
24 Defendants' information infrastructure and significant information about its internal operations. For  
25 example, Exhibit 3 to the declaration (the October 2024 list) includes 21 different policy resources  
26 from the source "new hire onboarding," giving competitors a peek into Defendants' onboarding  
27 process. The same is true of Exhibits 6, 16 and 17 to the declaration, which copy from Exhibit 3. The

1 list includes over 50 resources from the “agent, earner account, and payment homepage,” disclosing  
2 information about Defendants’ payment processes and policies with respect to drivers on the  
3 Defendants’ platform. Many names of policy-related resources, especially considered in light of the  
4 sheer volume of resources, disclose significant, non-public information about Defendants’ internal  
5 operations, including, but not limited to, how they conduct investigations, their standards for drivers  
6 and vehicles, their systems, and their organization systems for information, incidents, business  
7 operations, and more. Most of the policy-related resources lists include the Knowledge Base homepage  
8 or index in which they are found, providing further detail regarding Defendants’ information and  
9 operational organization and structure.

10 5. In the operation of their business, Defendants refer to guidelines and operating  
11 procedures developed to implement company safety policies and standards as “Knowledge Bases.”  
12 Knowledge Bases are developed by various teams and business groups across the company as a  
13 repository within the business unit. Knowledge Bases may be grouped thematically into landing pages  
14 called “Homepages” or “Repositories.” These Knowledge Bases are accessible to employees on an as-  
15 needed basis, depending on the employees’ roles and responsibilities within the company.

16 6. Moreover, Knowledge Bases are organized in a decentralized manner, and access is  
17 given to employees subject to role-based credentials and is limited to a subset of Knowledge Bases  
18 relevant to the scope of their jobs due to data security and proprietary concerns about access within  
19 company systems.

20 7. On information and belief, Defendants developed these resources at significant time  
21 and expense. A competitor, potential competitor, or other actor could use this information to attempt  
22 to replicate Defendants’ information infrastructure or business practices, such as which specific topics  
23 and categories of topics it should develop policies about to optimize business performance. This  
24 roadmap could also allow anyone who is able to breach Defendants’ information security systems to  
25 locate information of particular importance and value. Public disclosure of this roadmap of  
26 confidential, non-public information, exceeding what most of Defendants’ internal teams can access,  
27 would risk significant harm to Defendant and should therefore be sealed.

1           8.       The documents at issue in the Motion to Seal are substantially similar in nature and the  
2 documents' disclosure pose similar risks of harm to Defendants. The redactions in the Declaration to  
3 the Motion to Enforce consist of screenshot excerpts from the Exhibits to the Declaration. On  
4 information and belief, the information contained in the lists is not publicly available and is maintained  
5 as confidential by Defendants.

6           9.       My Declaration in support of the Motion to Enforce describes Exhibits 1, 3, 6, 7, 16,  
7 and 17 to the Declaration. My Declaration also demonstrates, through screenshots of its Exhibits, how  
8 the information on Confidential and Highly Confidential/Attorneys' Eyes Only ("AEO") MDL  
9 documents was extracted and placed on the October 2024 Spreadsheet, which was then used to create  
10 the lists attached to the discovery requests that are Exhibits 6, 7, 16 and 17 to the Declaration. The  
11 screenshots reveal the same information discussed above with respect to the complete versions of  
12 Exhibits 3, 6, 16 and 17. In addition, the Declaration contains screenshots of two documents produced  
13 in the MDL and designated (without challenge) Confidential or Highly Confidential/AEO. Paragraphs  
14 15 and 23 of the Declaration contain screenshots of the content of Confidential or Highly  
15 Confidential/AEO MDL documents. Paragraphs 16, 22 and 24 contain screenshots of Exhibit 3, the  
16 spreadsheet created using Confidential and Highly Confidential/AEO MDL documents discussed  
17 above. Paragraphs 22, 25, and 43 of the Declaration contain screenshots of Exhibit 6, 16 and 17, the  
18 discovery requests that include a list of 891 policy-related resources. The information contained in the  
19 spreadsheet and lists is not publicly available and is maintained as confidential by Defendants.

20           10.      No less restrictive alternative to partially sealing the documents at issue in the Motion  
21 to Seal, as requested above, is sufficient. Defendants have narrowly tailored their requests to seal by  
22 seeking to redact the documents at issue rather than sealing them in its entirety and narrowly tailoring  
23 their requested redactions. Actions short of sealing the documents requested by Defendants would not  
24 protect Defendants' legitimate interests.

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26           I declare under penalty of perjury that the foregoing is true and correct.  
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Executed this 18th day of July, 2025 in Houston, Texas.

/s/ Veronica Hayes Gromada  
Veronica Hayes Gromada